

Hearing Date and Time: September 27, 2007, at 10:00 A.M.

Response Date and Time: September 20, 2007, at 4:00 P.M.<sup>1</sup>

Elena Lazarou (EL-5681)  
Reed Smith LLP  
559 Lexington Avenue  
New York, New York 10022  
Telephone: 212-521-5400  
Facsimile: 212-521-5450

-and-

Stephen T. Bobo  
Reed Smith LLP  
10 South Wacker Drive, 40<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: 312-207-1000  
Facsimile: 312-207-6400

Attorneys for Johnson Controls Technology Company

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
Debtors.	:	Case No. 05-44481 (RDD)
	:	(Jointly Administered)
-----X	:	

**JOHNSON CONTROLS TECHNOLOGY COMPANY'S  
OBJECTION AND RESERVATION OF RIGHTS RELATING TO DEBTORS' MOTION  
FOR ORDER PURSUANT TO 11 U.S.C. §§ 105 (a) AND 502(c) (A) ESTIMATING AND  
SETTING MAXIMUM CAP ON CERTAIN CONTINGENT OR UNLIQUIDATED  
CLAIMS AND (B) APPROVING EXPEDITED CLAIMS ESTIMATION PROCEDURES  
WITH RESPECT TO CLAIM NUMBER 15519**

Johnson Controls Technology Company ("JCI") responds to the Debtors' Motion for  
Order Pursuant to 11 U.S.C. §§ 105(a) and 502(c) (A) Estimating and Setting Maximum Cap on

---

<sup>1</sup> The Debtors extended the response date and time vis a vis Johnson Controls Technology Company for this claim from September 20, 2007 to September 24, 2007 at 5:00 p.m.

Certain Contingent or Unliquidated Claims and (B) Approving Expedited Claims Estimation Procedures (“Estimation Motion”) with respect to JCI claim number 15519 as follows:

1. JCI filed claim number 15519 against the Debtors in connection with the various contractual dealings between JCI and various Delphi entities.

2. JCI objects to the Debtors’ Estimation Motion because it does not preserve the right for JCI to assert either a rejection damages claim in connection with any executory contract that the Debtors reject during these chapter 11 proceedings or a cure claim in connection with any executory contract that the Debtors assume during these Chapter 11 proceedings.

3. JCI expressly reserves the right to amend claim number 15519 or to otherwise seek additional amounts over and above the Capped Amount sought to be imposed by the Debtors for rejection damages in the event that the Debtors reject JCI contracts or for cure in the event that the Debtors assume JCI agreements.

Dated: September 24, 2007

RESPECTFULLY SUBMITTED

Johnson Controls Technology Company

By: /s/ Elena Lazarou

REED SMITH LLP  
599 Lexington Avenue  
New York, NY 10022  
Telephone: 212-521-5400  
Facsimile: 212-521-5450

Of Counsel

Stephen T. Bobo  
REED SMITH LLP  
10 South Wacker Drive  
40<sup>th</sup> Floor  
Chicago, IL 60606  
Telephone: 312-207-1000  
Facsimile: 312-207-6400